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**From:** Siedschlag, Gregory [Siedschlag.Gregory@epa.gov]  
**Sent:** 6/25/2021 6:32:48 PM  
**To:** Keigwin, Richard [Keigwin.Richard@epa.gov]  
**CC:** Lara, Rhina [Lara.Rhina@epa.gov]  
**Subject:** RE: OCSPP IO review: Press Inquiry -follow-up from The Intercept re: Questions about pesticide regulation

Thanks Rick and Rhina. Let's go with this edit:

Of the 12,096 pesticide products that were cancelled, 12,056 were voluntary cancelled as a result of our REDs, and 40 were suspended by EPA.

Sending to Michal now.

**Greg Siedschlag**

Chief, Communications Branch  
Office of Chemical Safety and Pollution Prevention  
U.S. Environmental Protection Agency  
Phone: (703) 603-9044  
Cell: (571) 319-7949  
*pronouns: he/him/his*

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**From:** Keigwin, Richard <Keigwin.Richard@epa.gov>  
**Sent:** Friday, June 25, 2021 2:20 PM  
**To:** Siedschlag, Gregory <Siedschlag.Gregory@epa.gov>  
**Cc:** Lara, Rhina <Lara.Rhina@epa.gov>  
**Subject:** RE: OCSPP IO review: Press Inquiry -follow-up from The Intercept re: Questions about pesticide regulation

Aah – very helpful. A suspension is not a cancellation by the agency.

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**From:** Siedschlag, Gregory <Siedschlag.Gregory@epa.gov>  
**Sent:** Friday, June 25, 2021 12:28 PM  
**To:** Keigwin, Richard <Keigwin.Richard@epa.gov>  
**Cc:** Lara, Rhina <Lara.Rhina@epa.gov>  
**Subject:** FW: OCSPP IO review: Press Inquiry -follow-up from The Intercept re: Questions about pesticide regulation  
**Importance:** High

Hi Rick,

See below and let us know your thoughts on these revisions.

**Greg Siedschlag**

Chief, Communications Branch  
Office of Chemical Safety and Pollution Prevention  
U.S. Environmental Protection Agency  
Phone: (703) 603-9044  
Cell: (571) 319-7949  
*pronouns: he/him/his*

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**From:** Lara, Rhina <Lara.Rhina@epa.gov>  
**Sent:** Friday, June 25, 2021 12:01 PM  
**To:** Siedschlag, Gregory <Siedschlag.Gregory@epa.gov>  
**Subject:** RE: OCSPP IO review: Press Inquiry -follow-up from The Intercept re: Questions about pesticide regulation  
**Importance:** High

Hi Greg,

Here's what we've got.

Here is the table with values from our FY19 Pesticide Reregistration Performance Measures and Goals Annual Progress Report, which has not been published yet but is routing for review now.

## Ex. 5 Deliberative Process (DP)

See responses to Mike's questions below in red and edits to the responses in your message also in red. The 40 value is all products that have been sent for suspension since the beginning of reregistration. Anita is trying to get me the list.

Best,

**Rhina M. Lara** (*she/her/hers*)

Communications Branch

Office of Chemical Safety and Pollution Prevention

U.S. Environmental Protection Agency

Phone: (202) 815- 5722

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**From:** Siedschlag, Gregory <[Siedschlag.Gregory@epa.gov](mailto:Siedschlag.Gregory@epa.gov)>

**Sent:** Friday, June 25, 2021 9:11 AM

**To:** Lara, Rhina <[Lara.Rhina@epa.gov](mailto:Lara.Rhina@epa.gov)>

**Subject:** FW: OCSPP IO review: Press Inquiry -follow-up from The Intercept re: Questions about pesticide regulation

Can you follow up on these questions, reconfirm these points, and send me any revisions?

**Greg Siedschlag**

Chief, Communications Branch

Office of Chemical Safety and Pollution Prevention

U.S. Environmental Protection Agency

Phone: (703) 603-9044

Cell: (571) 319-7949

*pronouns: he/him/his*

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**From:** Keigwin, Richard <[Keigwin.Richard@epa.gov](mailto:Keigwin.Richard@epa.gov)>

**Sent:** Friday, June 25, 2021 6:56 AM

**To:** Siedschlag, Gregory <[Siedschlag.Gregory@epa.gov](mailto:Siedschlag.Gregory@epa.gov)>

**Cc:** Ozmen, Shamus <[Ozmen.Shamus@epa.gov](mailto:Ozmen.Shamus@epa.gov)>; Lara, Rhina <[Lara.Rhina@epa.gov](mailto:Lara.Rhina@epa.gov)>; Cyran, Carissa <[Carissa.Cyran@epa.gov](mailto:Carissa.Cyran@epa.gov)>

**Subject:** Re: OCSPP IO review: Press Inquiry -follow-up from The Intercept re: Questions about pesticide regulation

Thanks Greg. I have a few more questions.

For the response to question 1:

—I think we mean the 8,000+ products have completed reregistration – This is correct. Clarified below.

—Do we need the phrase about the universe? That has been a tricky calculation over the years because the universe fluctuates. Removed in the response, feel free to edit wording. Not sure what is the best way to characterize this.

For the response to question 2:

## Ex. 5 Deliberative Process (DP)

For the response to question 4:

— I don't think we need the background section. Removed.

Rick Keigwin

Acting Deputy Assistant Administrator for Management

Office of Chemical Safety and Pollution Prevention

U.S. Environmental Protection Agency

Phone: 202-564-2910

Sent from my iPhone (Please excuse typos!)

On Jun 24, 2021, at 4:52 PM, Siedschlag, Gregory <[Siedschlag.Gregory@epa.gov](mailto:Siedschlag.Gregory@epa.gov)> wrote:

Hi Rick,

Please see below for our response to The Intercept. Please review by 3 p.m. tomorrow if possible. Let me know your thoughts on keeping the background section on #4 – I feel like it's expendable.

FYI, we have another inquiry pending with them (different reporter but same outlet) about our data and glyphosate. You should see something on that tomorrow.

1. You mentioned in your response that 8,846 pesticide products (i.e., registrations) have been reviewed and accepted to meet the requirements of the REDs for the active ingredients in each product. My question is: how many are still awaiting review? i.e. 8,846 have been completed out of how many overall?

Response: Ex. 5 Deliberative Process (DP)

### Ex. 5 Deliberative Process (DP)

2. When you say "Additionally, 12,056 pesticide products were cancelled during the Reregistration process," do you mean voluntarily cancelled - ie that the companies agreed not to reregister them? or involuntarily?

RESPONSE: Ex. 5 Deliberative Process (DP)

Ex. 5 Deliberative Process (DP)

3. Re bifenthrin: you write that "The results from the special pharmacokinetic (PK) study support the use of an oral study to assess the carcinogenic potential of bifenthrin which would be protective of tumors following inhalation exposure." I am not sure what special pharmacokinetic (PK) study you are referring to. Did you mention this elsewhere in your response? Is this a reference to the subchronic inhalation study?

RESPONSE: Ex. 5 Deliberative Process (DP)

### Ex. 5 Deliberative Process (DP)

## Ex. 5 Deliberative Process (DP)

4. Re acetamiprid: I now understand that EPA never adopted the lower number - the 2.5 mg/kg day. So my question is: why wasn't Nguyen's memo considered or responded to in the file? Why didn't they change the number based on the statistical analysis of EPA's own statistician? If EPA believed his analysis to be incorrect, why wasn't there anything in the file correcting it?

### RESPONSE:

## Ex. 5 Deliberative Process (DP)

Further details can be found in the DER for the acetamiprid DNT study as noted previously.

### Background:

## Ex. 5 Deliberative Process (DP)

### Greg Siedschlag

Chief, Communications Branch  
Office of Chemical Safety and Pollution Prevention  
U.S. Environmental Protection Agency  
Phone: (703) 603-9044  
Cell: (571) 319-7949  
*pronouns: he/him/his*

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**From:** Daguiard, Robert <Daguiard.Robert@epa.gov>

**Sent:** Tuesday, June 22, 2021 5:05 PM

**To:** Cyran, Carissa <Cyran.Carissa@epa.gov>; OPS CSID CB <OPS\_CSID\_CB@epa.gov>; Dunton, Cheryl <Dunton.Cheryl@epa.gov>

**Subject:** RE: Questions about pesticide regulation

Silly me: Here's the aforementioned follow-up to the follow-up. Thanks as always.

Hi Ken and Robert-

I'd like to add one more question to my follow-ups:

You mentioned in your response that 8,846 pesticide products (i.e., registrations) have been reviewed and accepted to meet the requirements of the REDs for the active ingredients in each product.

My question is: how many are still awaiting review? i.e. 8,846 have been completed out of how many overall?

Thanks,  
Sharon

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**From:** Daguillard, Robert <[Daguillard.Robert@epa.gov](mailto:Daguillard.Robert@epa.gov)>

**Sent:** Monday, June 21, 2021 11:33 AM

**To:** OPS CSID CB <[OPS\\_CSID\\_CB@epa.gov](mailto:OPS_CSID_CB@epa.gov)>; Dunton, Cheryl <[Dunton.Cheryl@epa.gov](mailto:Dunton.Cheryl@epa.gov)>

**Subject:** OPS: Questions about pesticide regulation

Team, follow-up questions from Sharon. Thanks as always.

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Hi Ken-

I have three follow-up questions:

When you say "Additionally, 12,056 pesticide products were cancelled during the Reregistration process," do you mean voluntarily cancelled - ie that the companies agreed not to reregister them? or involuntarily?

Re bifenthrin: you write that "The results from the special pharmacokinetic (PK) study support the use of an oral study to assess the carcinogenic potential of bifenthrin which would be protective of tumors following inhalation exposure." I am not sure what special pharmacokinetic (PK) study you are referring to. Did you mention this elsewhere in your response? Is this a reference to the subchronic inhalation study?

Re acetamiprid: I now understand that EPA never adopted the lower number - the 2.5 mg/kg day. So my question is: why wasn't Nguyen's memo considered or responded to in the file? Why didn't they change the number based on the statistical analysis of EPA's own statistician? If EPA believed his analysis to be incorrect, why wasn't there anything in the file correcting it?

Thanks,  
Sharon

Sharon Lerner  
Investigative Reporter  
The Intercept  
mobile/signal 718-877-5236  
[@fastlerner](mailto:@fastlerner)  
<https://theintercept.com/staff/sharonlerner/>

PGP:  
CB29 D9FF 9285 3205 087E 83A1 0C30 2F39 4F30 8BFE

On Jun 17, 2021, at 4:16 PM, Labbe, Ken <[Labbe.Ken@epa.gov](mailto:Labbe.Ken@epa.gov)> wrote:

Hi Sharon, Please see our responses below:

## **Ex. 5 Deliberative Process (DP)**

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Kenneth T. Labbe  
U.S. Environmental Protection Agency  
Office of Public Affairs  
1200 Pennsylvania Avenue, NW  
Washington, D.C. 20460  
Office: 202-564-1486  
Cell: 202-740-3770